

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO OF OHIO
FRANKLIN DIVISION**

UNITED STATES OF AMERICA

Plaintiff

v.

TOMAS HAILEMARIAM

Defendant.

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CASE NO. 2:22-CR-109

JUDGE MORRISON

**MOTION OF DEFENDANT, TOMAS HAILEMARIAM, FOR PRETRIAL
NOTICE OF OTHER ACTS 404(B) EVIDENCE WHICH THE GOVERNMENT
INTENDS TO INTRODUCE AT TRIAL**

Defendant, Tomas Hailemariam, through undersigned counsel, pursuant to Rule 404 (b), Federal Rules of Evidence, moves the Court for an Order requiring the Government to provide notice of the nature of any "other acts" evidence with respect to Tomas Hailemariam, which the Government intends to introduce at trial.

This motion is submitted in accordance with Rule 404 (b), Federal Rules of Evidence.

Respectfully submitted,

/s/ Dustin M. Blake

Dustin M. Blake (0080560)

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MEMORANDUM

Pursuant to Rule 404 (b) of the Federal Rules of Evidence, Defendant, Tomas Hailemariam, moves this Court for pretrial notice of any evidence the Government intends to introduce at trial that is evidence of other crimes, wrongs or acts.

Respectfully submitted,

/s/ Dustin M. Blake
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CERTIFICATE OF SERVICE

I hereby certify a copy of the foregoing was electronically served upon the Assistant United States Attorney, United States Attorney's Office, 303 Marconi Blvd., Suite 200, Columbus, Ohio 43215, on this June 27, 22.

/s/ Dustin M. Blake
Dustin M. Blake (0080560)